

1 MICHAEL F. BOHN, ESQ.  
2 Nevada Bar No.: 1641  
2 [mbohn@bohnlawfirm.com](mailto:mbohn@bohnlawfirm.com)  
3 ADAM R. TRIPPIEDI, ESQ.  
3 Nevada Bar No. 12294  
4 [atrippiedi@bohnlawfirm.com](mailto:atrippiedi@bohnlawfirm.com)  
4 LAW OFFICES OF  
5 MICHAEL F. BOHN, ESQ., LTD.  
5 2260 Corporate Circle, Ste. 480  
6 Henderson, Nevada 89074  
6 (702) 642-3113/ (702) 642-9766 FAX  
7 Attorney for defendant Daisy Trust

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

10 THE BANK OF NEW YORK MELLON F/K/A  
11 THE BANK OF NEW YORK AS TRUSTEE  
12 FOR THE CERTIFICATEHOLDERS OF  
13 CWMBS, INC., CHL MORTGAGE PASS  
THROUGH TRUST 2004-29, MORTGAGE  
PASS-THROUGH CERTIFICATES, SERIES  
2004-29, 2505 W. CHANDLER BLVD.,  
CHANDLER, AZ 85224

14 Plaintiff,

15 | VS.

16 CASCADING HOMEOWNERS ASSOCIATION,  
17 INC.; DAISY TRUST; AND ABSOLUTE  
COLLECTION SERVICES, LLC,  
Defendants.

10 DAISY TRUST,

21 THE BANK OF NEW YORK MELLON F/K/A  
22 THE BANK OF NEW YORK AS TRUSTEE  
23 FOR THE CERTIFICATEHOLDERS OF  
24 CWMBS, INC., CHL MORTGAGE PASS  
25 THROUGH TRUST 2004-29, MORTGAGE  
PASS-THROUGH CERTIFICATES, SERIES  
2004-29, 2505 W. CHANDLER BLVD.,  
CHANDLER, AZ 85224

## 26 || Counter-defendant.

27 | CASCADE HOMEOWNERS ASSOCIATION,

CASE NO.: 2:16-cv-01317-JCM-GWF

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR DAISY  
TRUST'S OPPOSITION TO SECOND  
MOTION FOR SUMMARY JUDGMENT**  
**(First Request)**

1 IT IS HEREBY STIPULATED AND AGREED by and between defendant Daisy Trust, by and  
2 through its attorney, Adam R. Trippiedi, Esq.; and plaintiff The Bank of New York Mellon f/k/a the Bank  
3 of New York as Trustee for the Certificateholders of CWMBS, Inc., CHL Mortgage Pass Through Trust  
4 2004-29, Mortgage Pass-Through Certificates, Series 2004-29, 2505 W. Chandler Blvd., Chandler, AZ  
5 85224, by and through its attorney, William S. Habdas, Esq., as follows:

6 1. On September 30, 2019, plaintiff filed a second motion for summary judgment (ECF 71).

7 2. The parties are very close to resolving this matter but require additional time to reach a  
8 settlement.

9 3. Based on the anticipated settlement, and in an effort to conserve the parties' resources and  
10 judicial resources, the parties agree that defendant Daisy Trust's opposition to plaintiff's second motion  
11 for summary judgment shall be due November 21, 2019.

12 4. Plaintiff's reply in support of its second motion for summary judgment shall be due December  
13 2, 2019.

14 5. This request is made in good faith and not for purposes of delay.

15 DATED this 21st day of October, 2019.

16 LAW OFFICES OF  
17 MICHAEL F. BOHN, ESQ. LTD.

18 By: /s/ Michael F. Bohn, Esq. /  
19 Michael F. Bohn, Esq.  
20 Adam R. Trippiedi, Esq.  
21 2260 Corporate Circle, Suite 480  
Henderson, Nevada 89074  
Attorney for defendant Daisy Trust

AKERMAN LLP

By: /s/ William S. Habdas, Esq. /  
Ariel E. Stern, Esq.  
William S. Habdas, Esq.  
1635 Village Center Cir, Ste 200  
Las Vegas, Nevada 89134  
Attorney for plaintiff

22 ///

23 ///

24 ///

25

26

27

28

## ORDER

IT IS HEREBY ORDERED as follows:

3           1. Daisy Trust's opposition to plaintiff's second motion for summary judgment shall be due  
4 November 21, 2019.

5           2. Plaintiff's reply in support of its second motion for summary judgment shall be due  
6 December 2, 2019.

IT IS SO ORDERED October 21, 2019.

James C. Mahan  
UNITED STATES DISTRICT JUDGE